

**DETAILED COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE SOUTHEAST SUPPLY HEADER PROJECT**

Existing Air Quality - There is a typographical error on page 3-102. There needs to be a comma and a space between "monoxide" and "ozone" in the list of NAAQS criteria pollutants. Also, there are now seven criteria pollutants instead of just six as referenced in the beginning of the paragraph.

Air Quality Control Regions (AQCR) and Attainment Status - Although the discussion (on page 3-102) about air quality control regions (AQCR's) is not incorrect, the AQCR concept no longer has any real use. Nonattainment designations, for example, are made on the basis of counties or portions of counties.

Operations Emissions - In the discussion on pages 3-109 and 3-110, no details are provided on how emissions were calculated beyond the footnotes in the tables provided in Section 3.11. Additionally, no information is included regarding what measures are being taken to minimize air emissions from the 3 compressor stations and 2 booster stations (i.e., will the Solar 100 turbines have Dry Low NO_x burners to minimize NO_x emissions)?

Title V Permitting - In the title V permitting paragraph on page 3-108, the second sentence should be changed from "...with criteria pollutant emissions that reach or exceed major source levels..." to "... with regulated pollutants (including HAPs) that reach or exceed...."[Explanation: The title V program applies to pollutants other than just the criteria pollutants.]

Effects of Transmitting and Burning Imported LNG - Imported LNG when vaporized tends to have characteristics that differ from the domestically produced natural gas currently transmitted through the pipelines that comprise the project. For example, vaporized imported LNG tends to have a higher heat content than domestic natural gas and may produce higher nitrogen oxides emissions when burned unless adequately mixed with domestic natural gas or otherwise conditioned. A concern has also been raised in at least one instance about the possibility of vaporized imported LNG transmission leading to degradation of pipeline seals and causing pipeline leaks. FERC may wish to consider these possible effects when preparing the final EIS.

Waters of the U.S. comments:

For all wetland and waters of the U.S. impacts in the State of Alabama the following functional assessments should be utilized to determine the appropriate amount of mitigation required for unavoidable impacts to ensure no net loss of function. For wetlands the Wetland Rapid Assessment Procedure (WRAP) and for stream impacts the Mobile District COE SOP, Compensatory Stream Mitigation Guidelines should be used.

EPA has also noted that the wetland function of mowed herbaceous wetlands that will be located in the right of way should yield low WRAP scores as their function will be compromised. In addition, mitigation should be type-for-type, e.g. forested wetland impacts should be mitigated with forested wetland credits and not emergent and scrub-shrub wetlands that will be maintained within the permanent right of way.

